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### **REMARKS**

Entry of this Amendment is proper since it narrows the issues on appeal and does not require further search by the Examiner.

Claims 16-23 and 25-34 are all the claims presently pending in the application. Claim 24 has been canceled. Claims 16, 18, 21 and 25 have been amended to further define the claimed invention.

It is noted that the amendments are made only to overcome the Examiner's non-statutory objections, and to more particularly define the invention and not for distinguishing the invention over the prior art, for narrowing the scope of the claims, or for any reason related to a statutory requirement for patentability.

It is further noted that, notwithstanding any claim amendments made herein, Applicant's intent is to encompass equivalents of all claim elements, even if amended herein or later during prosecution.

Applicant gratefully acknowledges the Examiner's indication that claims 21, 22 and 25-33 are allowable. Applicant notes that claims 21 and 25 have been amended to be in independent form, and therefore, claims 21, 22 and 25-33 are in condition for immediate allowance.

Claims 16, 17, 19, 20, 23, 24 and 34 stand rejected under 35 U.S.C. § 102(e) as anticipated by Chong (U.S. Patent No. 6,093,330). Claims 16-20, 23 and 34 stand rejected under 35 U.S.C. § 102(e) as anticipated by Farnaam (U.S. Patent No. 6,036,874).

These rejections are respectfully traversed in view of the following discussion.

#### **I. THE CLAIMED INVENTION**

Applicant's invention, as disclosed and claimed, for example by claim 16 is directed to a method for manufacturing an ink jet recording head. The method includes forming a pressure generating chamber from a chamber plate with a pair of sides such that the pair of sides includes a plurality of arcuate portions, and forming an ink supply plate on a side of the chamber plate, the ink supply plate having an ink outlet passage having an upper passageway and a lower passageway which is displaced in a downstream direction from the upper passageway.

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Conventional methods form an ink supply plate having an ink outlet passage 66 which does not have upper and lower passageways (e.g., see Application at Figure 8). Thus, it is impossible to tilt or incline the flow direction of the ink (e.g., in the ink outlet passage).

The claimed invention, on the other hand, forms an ink supply plate having an ink outlet passage with an upper passageway and a lower passageway which is displaced in a downstream direction from the upper passageway (Application at Figure 4). This allows the claimed invention to tilt or incline the flow direction of the ink (e.g., in the ink outlet passage) (Application at page 34, lines 20-29).

### III. THE PRIOR ART REJECTIONS

#### A. The Chong, et al. Reference

The Examiner alleges that Chong teaches the invention of claims 16-17, 19-20 23-24 and 34. Applicant submits, however, that there are elements of the claimed invention that are not taught or suggested by Chong.

Specifically, Chong does not teach or suggest *"forming an ink supply plate on a side of said chamber plate, said ink supply plate comprising an ink outlet passage comprising an upper passageway and a lower passageway which is displaced in a downstream direction from said upper passageway"*, as recited, for example, in claim 16.

As noted above, unlike conventional methods form an ink supply plate in which it is impossible to tilt or incline the flow direction of the ink (e.g., in the ink outlet passage), the claimed invention forms an ink supply plate having an ink outlet passage with an upper passageway and a lower passageway which is displaced in a downstream direction from the upper passageway (Application at Figure 4). This allows the claimed invention to tilt or incline the flow direction of the ink (e.g., in the ink outlet passage) (Application at page 34, lines 20-29).

Clearly, these features are not taught or suggested by Chong. Indeed, Applicant notes that nowhere has the Examiner alleged that Chong discloses such a feature. In fact, Applicant notes that these features were included in claim 21 which the Examiner conceded was not taught or suggested by Chong.

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In particular, the Examiner attempts to rely on Figures 37-40 of Chong to support his position. However, nowhere do these figures (or anywhere else in Chong for that matter) teach or suggest an ink supply plate, let alone an ink supply plate having an ink outlet passage with an upper passageway and a lower passageway which is displaced in a downstream direction from the upper passageway. Thus, like conventional methods discussed in the Application, the Chong method does not allow for tilting or inclining the flow direction of the ink (e.g., in the ink outlet passage).

Therefore, Applicant respectfully submits that Chong does not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

#### **B. The Farnaam Reference**

The Examiner alleges that Farnaam teaches the invention of claims 16-20, 23 and 34. Applicant submits, however, that there are elements of the claimed invention that are not taught or suggested by Farnaam.

Specifically, Farnaam does not teach or suggest *"forming an ink supply plate on a side of said chamber plate, said ink supply plate comprising an ink outlet passage comprising an upper passageway and a lower passageway which is displaced in a downstream direction from said upper passageway"*, as recited, for example, in claim 16. As noted above, this allows the claimed invention to tilt or incline the flow direction of the ink (e.g., in the ink outlet passage) (Application at page 34, lines 20-29).

Clearly, these features are not taught or suggested by Farnaam. Indeed, Applicant notes that nowhere has the Examiner alleged that Farnaam discloses such a feature. In fact, Applicant notes that these features were included in claim 21 which the Examiner conceded was not taught or suggested by Farnaam.

In particular, the Examiner attempts to rely on Figure 5D of Farnaam to support his position. However, nowhere does this figure (or anywhere else in Farnaam for that matter) teach or suggest an ink supply plate, let alone an ink supply plate having an ink outlet passage with an

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upper passageway and a lower passageway which is displaced in a downstream direction from the upper passageway. Thus, like conventional methods discussed in the Application, and like the method in Chong, the Farnaam method does not allow for tilting or inclining the flow direction of the ink (e.g., in the ink outlet passage).

Therefore, Applicant respectfully submits that Farnaam does not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

### III. FORMAL MATTERS AND CONCLUSION

The Examiner objects to the specification as not defining the term "adjoins". Applicant notes that claim 18 has been amended to delete the term "adjoins".

The Examiner further objects to the term "semispherical" in the Application. Applicant notes, however, that this term is commonly used and universally understood by those of ordinary skill in the art. Indeed, the term "semispheric" may be defined as "shaped like half a sphere; hemispheric. Also semispherical." (*Webster's Encyclopedia Unabridged Dictionary of the English Language*, Page 1298, (1989), Random House).

Therefore, the Examiner is respectfully requested to withdraw these objections.

In view of the foregoing, Applicant submits that claims 16-23 and 25-34, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

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The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: 10/14/04

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**CERTIFICATE OF FACSIMILE TRANSMISSION**

I hereby certify that the foregoing Amendment was filed by facsimile with the United States Patent and Trademark Office, Examiner Anita Karen Alanko, Group Art Unit # 1765 at fax number (703) 872-9306 this 14th day of October, 2004.



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